

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

MOOG INC.,

Plaintiff,

v.

Case No.: 1:22-cv-00187

SKYRYSE, INC., ROBERT ALIN
PILKINGTON, MISOOK KIM, and DOES NOS.
1-50,

Defendants.

DECLARATION OF RENA ANDOH

RENA ANDOH, under penalty of perjury and pursuant to 28 U.S.C. § 1746,
declares the following to be true and correct:

1. My name is Rena Andoh. I am a partner at Sheppard, Mullin, Richter & Hampton LLP. I am over the age of 18 years old. I have personal knowledge of the matters set forth herein and if called as a witness, I could and would competently testify as to all facts set forth herein. I am counsel for plaintiff Moog Inc. (“Moog”) and I provide this declaration in support of Moog’s Motion to Compel Written Discovery Responses and Production of Documents.

2. Attached as Exhibit “A” is a true and correct copy of Moog’s June 16, 2022 letter submitted via e-mail the Court.

3. Attached as Exhibit “B” is a true and correct copy of Skyryse’s June 24, 2022 letter.

4. Attached as Exhibit “C” is a true and correct copy of Skyryse’s Third Supplemental Responses to Moog’s First Set of Special Interrogatories served on June 24, 2022.

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5. Attached as Exhibit “D” is a true and correct copy of e-mail correspondence between counsel for Moog and Skyryse between June 15 and 29, 2022.

6. Attached as Exhibit “E” is a true and correct copy of a June 21, 2022 e-mail from Moog’s counsel to Skyryse’s counsel.

7. Attached as Exhibit “F” is a true and correct copy of e-mail correspondence between counsel for Moog and Skyryse between June 24 and 27, 2022.

8. Attached as Exhibit “G” is a true and correct copy of Skyryse’s responses to Moog’s First Set of Requests for Production of Documents served on April 13, 2022.

9. Attached as Exhibit “H” is a true and correct copy of a June 7, 2022 e-mail from Moog’s counsel to Skyryse’s counsel.

10. Attached as Exhibit “I” is a true and correct copy of an April 6, 2022 e-mail from Moog’s counsel to counsel for Defendants’ and iDS, as well as the attached draft inspection protocol to that e-mail.

11. Attached as Exhibit “J” is a true and correct copy of Skyryse’s proposed draft additional source code protocol, circulated on June 28, 2022.

12. My firm’s e-discovery team has informed me that Skyryse has produced 295 files directly to Moog designated as “HIGHLY CONFIDENTIAL-SOURCE CODE.”

I declare that the foregoing is true and correct under penalty of perjury under the laws of the United States of America.

Dated: June 30, 2022

/s/ Rena Andoh
Rena Andoh